MN - 252 (Revised 10/00)

Dated: June 5, 2019

## UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re:

James D. and Diane L. Rose, BKY No. 19-41577-KHS

Debtors. Chapter 7

#### APPLICATION FOR APPROVAL OF EMPLOYMENT OF ATTORNEY

- 1. Applicant is the trustee in this case.
- 2. Applicant believes that the employment of an attorney is necessary to represent or assist the trustee in carrying out the trustee's duties as follows: to advise the trustee regarding contract and deed issues related to sale of real property, recovery of non-exempt funds and any necessary claim objection actions.
- 3. Julia A. Christians of Lapp, Libra, Stoebner & Pusch, Chartered, 120 South Sixth Street, Suite 2500, Minneapolis, MN 55402, 612-338-5815, is qualified by reason of practice and experience to render such representation or assistance.
- 4. Proposed compensation and reimbursement of expenses is as follows: \$480.00 per hour for Julia A. Christians, \$190.00 per hour for paralegal services, and the normal hourly rate for other attorneys in the firm. In addition, said compensation rates are subject to periodic adjustments.
- 5. Said professional has disclosed to the undersigned that she has the following connections with the debtor(s), creditors, any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee: She is the Chapter 7 Trustee for the above-referenced bankruptcy estate.
- 6. The trustee has made the following efforts to recover the asset prior to submitting this Application: Conferred with a real estate agent, reviewed requested sale documentation and responded to the issues in dispute.

WHEREFORE, applicant prays that the Court approve such employment by the trustee.

/e/ Julia A. Christians Julia A. Christians, Trustee 120 South Sixth Street, Suite 2500 Minneapolis, MN 55402 (612) 338-5815 Case 19-41577 Doc 9 Filed 06/05/19 Entered 06/05/19 15:39:06 Desc Main Document Page 2 of 4

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In re:

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**VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)** 

\_\_\_\_\_

I, Julia A. Christians of Lapp, Libra, Stoebner & Pusch, Chartered, the professional named in the application for employment on behalf of the above named bankruptcy estate, declare under penalty of perjury the following:

- 1. I do not hold or represent any interest adverse to the estate and am disinterested as required by 11 U.S.C. § 327.
- I do not have any connections to the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the offices of the United States Trustee, except for the following: I am the Chapter 7 Trustee for the above-referenced bankruptcy estate.

Dated: June 5, 2019 By: /e/ Julia A. Christians

Julia A. Christians Lapp, Libra, Stoebner & Pusch, Chartered 120 South Sixth Street, Suite 2500 Minneapolis, MN 55402 612-338-5815 MN - 252 (Revised 10/00)

# UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re:

James D. and Diane L. Rose, BKY No. 19-41577-KHS

Debtors. Chapter 7

### UNSWORN CERTIFICATE OF SERVICE

I, Katie J. Stimpel, declare under penalty of perjury that on June 5, 2019, I e-mailed copies of the attached **Application for Approval of Employment of Attorney, Verified Statement, and proposed Order** to each entity named below at the address stated below for each entity:

### USTPRegion12.MN.ECF@usdoj.gov

U.S. Trustee 1015 U.S. Courthouse 300 South Fourth Street Minneapolis, MN 55415

Executed on: June 5, 2019 /e/ Katie J. Stimpel

Katie J. Stimpel, Legal Assistant Lapp, Libra, Stoebner & Pusch, Chartered 120 South Sixth Street, Suite 2500 Minneapolis, MN 55402 612/338-5815 MN - 252 (Revised 10/00)

Dated:

UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA	
In re:	
James D. and Diane L. Rose,	BKY No. 19-41577-KHS
Debtors.	Chapter 7
	ORDER
The trustee's application to approv	re the employment of Lapp, Libra, Stoebner & Pusch,
Chartered, as the trustee's attorneys came b	pefore the court.
Based on the application, the recommenda	tion of the United States Trustee and 11 U.S.C. § 327,
IT IS ORDERED: the employmen	nt is approved.

Kathleen H. Sanberg Chief United States Bankruptcy Judge